

**United States Bankruptcy Court**  
**Northern District of Illinois, Eastern Division**

IN RE: Timothy G Montalvo	)	Chapter 13
Jeannette Montalvo	)	Case No. 19 B 07803
Debtor(s)	)	Judge LaShonda A. Hunt

**Notice of Motion**

Timothy G Montalvo  
Jeannette Montalvo  
6978 W Cleveland St  
Niles, IL 60714

Debtor Attorney: David M Siegel  
via Clerk's ECF noticing procedures

On June 24, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

- > Dirksen Federal Building
- > 219 South Dearborn
- > Courtroom 719
- > Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Tuesday, June 11, 2019.

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 03/20/2019.
2. The Debtor has failed to amend the plan at section 8.1 to remove the surrender language.
3. The Debtor is over the debt limit.
4. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE